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October 30, 1996

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Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, D.C. 20554

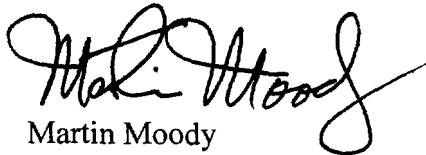
RE: Ex Parte Correspondence
CC Docket No. 94-102

Dear Mr. Caton:

Today, Martin Moody on behalf of Telident, Inc., spoke with Alan Thomas of the Common Carrier Bureau. He notified Alan that the enclosed document was being sent to Alan, Gregory Cooke, and Anne Bisese. It outlines suggested changes to NPRM 94-102 Appendix C.

An original and one copy of this Notice are also being submitted to the Secretary. Please contact me if you have any questions regarding this matter.

Respectfully submitted,



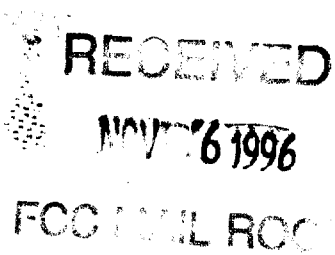
Martin Moody
Vice President Advanced Engineering
TELIDENT, INC.

Enclosure

cc: Anne Bisese
Gregory Cooke
Alan Thomas

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CC Docket No. 94-102
RM-8143

NOTICE OF PROPOSED RULE MAKING

APPENDIX C

PROPOSED RULES

**CHANGES to the NPRM's
proposed text are bold,
and numbered C1, C2, etc**

Part 68 of the Commission's Rules and Regulations (Chapter 1 of Title 47 of the Code of Federal Regulations, Part 68) is proposed to be amended as follows:

1. The authority citation for Part 68 remains as follows:

AUTHORITY: Sections 1, 4, 5, 201-205, 208, 215, 218, 226, 227, 302, 303, 313, 314, 332, 403, 404, 410, 602 of the Communications Act of 1934, as amended, 47 U.S.C. 151, 154, 155, 201-5, 208, 215, 218, 226, 227, 302, 303, 313, 314, 332, 403, 404, 410, 602.

2. Section 68.1 is proposed to be amended by deleting the present Section 68.1 in its entirety and substituting the following:

§ 68.1 Purpose

The purpose of the rules and regulations in this part is to provide for uniform standards for the protection of the telephone network from harm caused by the connection of terminal equipment and associated wiring thereto, for the correct operation of terminal equipment with public emergency access networks, and for the compatibility of hearing aids and telephones.

C1. Section 68.2 is proposed to be amended by revising subparagraph (3) to expand the Scope to include the connection of terminal equipment for Enhanced 911 access for dispersed station applications.

Section 68.2 Scope

(3) of all PBX or multi-line telecommunications (or similar) systems to private line services for tie trunk type interfaces, off-premises station lines, automatic identified outward dialing, message registration, **and dedicated Enhanced 911 system access.**

3. Section 68.3 is proposed to be amended by inserting, according to the alphabetical order of the term defined, each of the following definitions among the definitions already present:

C2. There are modifications to the proposed definitions and additional definitions proposed. There is a change proposed to a table accompanying Figure 68.3(a).

Caller's Emergency Service Identification (CESID): The number used to identify the calling terminal within the context of the Enhanced 911 System. It is often, but not always, the directory number of the calling terminal.

MODIFY THIS PROPOSED DEFINITION (provided by PUBLIC SAFETY et al):

Enhanced 9-1-1: ~~A telephone network feature that automatically provides emergency response agencies with telephone directory number and location information on calls placed to the national emergency number, 9-1-1.~~

ADD THIS DEFINITION:

Enhanced 911 System: Emergency service switching and transport equipment that routes (based on the CESID) 911 calls to Public Safety Answering Points (PSAPs), and provides the CESID to the PSAP.

MODIFY THIS PROPOSED DEFINITION:

Enhanced 9-1-1 compatibility: The ability to provide the caller's emergency service identification to the Enhanced 911 System. The CESID may be the trunk group or business line ID that is provided by the network (non-dispersed station applications), or may be provided by the MLTS equipment (including the use of an adjunct) utilizing Enhanced 911 emergency services interfaces (dispersed station applications).

MODIFY THIS PROPOSED DEFINITION:

Enhanced 9-1-1 emergency services trunk: A 2-wire network-provided reverse battery circuit that provides access to Enhanced 9-1-1 service.

Dispersed private telephone system: A PBX or similar multi-line telephone system whose connection to the telephone network carries emergency calls from more than one emergency response location.

UNDER DEFINITION BY PUBLIC SAFETY, AD-HOC, MMTA, et al

Emergency response location: A specific site, ~~corresponding to a calling station in a dispersed private telephone system.~~

ADD TO APPENDIX C (this is an existing part 68 defn that has been modified):

Line Simulator Circuit: A circuit that simulates the network side of a 2-wire or 4-wire telephone connection during testing. The required circuit schematics are shown in Figure 68.3 (a) for 2-wire loop or ground start circuits **and 2-wire network-provided reverse battery circuits**, Figure 68.3 (b) for 2-wire.....etc..

Multi-line Telecommunication System (MLTS): Switching equipment that gives many telephones (i.e. stations) access to public network trunks for making phone calls. An MLTS must provide Enhanced 911 compatibility. MLTS includes Private Branch Exchange (PBX), Multi-Function (Hybrid) System, and Key Telephone System (KTS) equipment.

Multi-frequency signaling: An address signaling method that uses the simultaneous transmission of two sinusoidal frequencies from a group of six frequencies to represent numerical values and control signals.

Network-Provided Reverse Battery: A type of supervisory signaling employing network-provided dc power. Terminal equipment provides a high resistance tip to ring path (>100 kilohms) to indicate an on-hook condition and a low resistance tip to ring path (<670 ohms) to indicate an off-hook condition. Terminal equipment recognizes the polarity of tip more positive than ring as a network on-hook signal and tip more negative than ring as a network off-hook signal.

Figure [68.3 (a)]

[Same as existing Figure, with the following new entry:

Network-provided Reverse Battery			
Condition	Volts	Switch Position	R2 + RL
1	35 to 80	Both	Continuously variable over 400 to 4200 ohms

Restriction: The blocking of specific dial codes and sequences during call initiation.

UNDER DEFINITION BY PUBLIC SAFETY, AD-HOC, MMTA, etc.

Section 68.106

3. Section 68.106 is proposed to be amended to read as follows:

§ 68.106 [Amended]

(f) *Dispersed private telephone system trunk and station number verification for Enhanced 911 purposes.* ~~Customers who install dispersed private telephone systems after [insert date 18 months after effective date of order adopting rules in this proceeding] shall provide the telephone company with:~~

- ~~_____ (1) The number of trunk connections desired~~
- ~~_____ (2) The number of stations that may originate emergency calls~~
- ~~_____ (3) The number of, and identification of emergency response locations that will require number identification.~~
- ~~_____ (4) The FCC Registration Number of the equipment being used. The telephone company will provide 10-digit numbers for the identified emergency response locations.~~

UNDER DEFINITION BY PUBLIC SAFETY, AD-HOC, MMTA, etc.

Section 68.228

Section 68.228 is proposed to be added as follows:

§ 68.228 Enhanced 911 trunk and station number verification.

(a) *Verification requirements.*

(1) *General.* ~~The proper transmission of station number identification (SNI) for the station dialing the emergency number 911 shall be verified as part of initial installation and subsequent changes in emergency response location data.~~

(2) *Station Number Identification.* ~~The 10-digit station number identification transmitted for 911 calls shall be verified to:~~

~~_____ (i) be in the group of station numbers assigned to the trunk by the telephone company and, (ii) be assigned to the specific emergency response location of the corresponding calling station.~~

(b) *Verification personnel.* ~~Work associated with the verification of Enhanced 911 emergency services trunk operation shall be performed under the supervision and control of a supervisor as defined in paragraph (c) of this section. The supervisor and installer may be the same person.~~

(c) *Supervision.* ~~Work by installation personnel shall be performed under the responsible supervision and control of a person who:~~

~~—— (i) —— Has at least 6 months of on-the-job experience in the installation of telephone terminal equipment;~~

~~—— (ii) —— Has been trained in the operation of Enhanced 911 emergency services trunks and in the performance of operations need to verify proper identification procedures and results;~~

~~—— (iii) —— Or, regardless of compliance with paragraphs (c)(1) and (c)(2) of this section, is a licensed professional engineer in the jurisdiction in which the installation is performed.~~

(d) *Verification procedure.* ~~The installation supervisor shall provide written notification to the telephone company that the required verification tests have been performed, including the following information:~~

~~—— (1) —— The responsible supervisor's full name, address and business telephone number; and~~

~~—— (2) —— The date when Enhanced 911 trunks will go into service, the date when the verification tests were completed, and a list of trunk identification numbers and station numbers verified.~~

(e) *Verification of changes.* ~~Addition or deletion of Enhanced 911 data base entries will be cause for verification of operations.~~